

# EXHIBIT N

STATE OF NEW YORK  
SUPREME COURT            ALBANY COUNTY

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In the Matter of the  
Special Proceeding Application of

**Index No.: 900899-22**

VW CREDIT, INC.,

Petitioner/Plaintiff,

**NOTICE OF MOTION  
FOR SANCTIONS**

-against-

BOSCAINO COLLISION & TOWING CORP.,  
and THE NEW YORK STATE DEPARTMENT  
OF MOTOR VEHICLES,

Respondent(s)/Defendant(s).

Judge Assigned:  
Hon. Richard M. Platkin

**PLEASE TAKE NOTICE** that upon the annexed affirmation of Rudolph J. Meola, dated September 25, 2023, together with the exhibit attached thereto, the undersigned will move this Court on October 13, 2023 at 10:30 o'clock in the forenoon, or as soon thereafter as counsel can be heard for an order pursuant to 22 NYCRR 130-1.1 (c) (1) (2) and (3) assessing sanctions against Boscaino Collision & Towing Corp., Rosen Law LLC and Gary Rosen, Esq. for engaging in frivolous conduct, attempting to influence this litigation by frivolous assertions, threats and intimidation, and;

**PLEASE TAKE FURTHER NOTICE** that any opposition hereto must be served at least seven (7) days prior to the return date hereof.

Dated: Albany, New York  
September 25, 2023

**LAW OFFICE OF RUDOLPH J. MEOLA**

TO:

Gary Rosen, Esq.  
ROSEN LAW, LLC

**Attorney for Respondent**

**Boscaino Collision & Towing Corp.**  
216 Lakeville Road  
Great Neck, NY 11020

By

Rudolph J. Meola  
Attorney for Petitioner/Plaintiff  
1822 Western Avenue  
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